IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

| In re: |)) | Chapter 11 |
|----------------------|--------|-------------------------|
| JOANN, Inc., et al., |)) | Case No. 25-10068 (CTG) |
| Wind-Down Debtors. |)) | (Jointly Administered) |

MOTION AND ORDER FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves the admission *pro hac vice* of Charles J. Fendrych of Kelley Drye & Warren LLP to represent Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the GUC Trustee in this action.

Dated: July 24, 2025 /s/ Bradford J. Sandler

Bradford J. Sandler (DE Bar No. 4142) Pachulski Stang Ziehl & Jones LLP 919 North Market Street, 17th Floor

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100 Email: bsandler@pszjlaw.com

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing, and in good standing as a member of the Bar of the State of New York, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 12/21/23. I further certify that the fee of \$50.00 has been paid to the Clerk of Court for District Court.

Dated: July 24, 2025 /s/ Charles J. Fendrych

Charles J. Fendrych
Kelley Drye & Warren LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808, 7800

Telephone: (212) 808-7800

Email: cfendrych@kelleydrye.com

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.